

Weyerhaeuser Company • 220 Occidental Ave. South • Seattle, WA 98104

February 3, 2026

SEPA Revised Draft EIS for the Chehalis Flood Damage Reduction Project
c/o Bobbak Talebi
Southwest Region Office
P.O. Box 47775
Olympia, WA 98504-7775

Subject: Comments on SEPA Revised Draft EIS for the Chehalis Flood Damage Reduction Project

To Whom It May Concern,

This comment letter is being submitted via Ecology's electronic SEPA comment portal as part of the official public comment record for the Revised Draft EIS (issued November 20, 2025; SEPA# 202504854).

Weyerhaeuser remains concerned that the revised proposal does not meaningfully address the underlying flooding problem in the Chehalis Basin while imposing significant environmental and economic costs on our commercial forestlands. The level of impact associated with the proposed dam footprint—particularly to geomorphology, aquatic resources, forest productivity, and operational infrastructure—is substantial, and in many cases, not realistically mitigable given the scale and nature of the effects. These foundational concerns guide and justify the comments we continue to provide in this process.

Weyerhaeuser recognizes the improvements made in the Revised Draft EIS, particularly the greater transparency in analytical methods, the integration of climate considerations, and the expanded geotechnical and geomorphic evaluations. These additions enhance the clarity and utility of the document. At the same time, we reiterate and incorporate by reference the concerns detailed in Weyerhaeuser's November 17, 2020 USACE NEPA DEIS comment letter, which remain directly relevant to the current SEPA review.

Consistent with our earlier comments, Weyerhaeuser remains concerned about the proposed project's potential impacts on commercial forestlands, fish and aquatic resources, sediment and channel processes, slope stability, and day-to-day forest operations across our working landscape. These concerns are reinforced by Ecology's discipline findings, which continue to identify significant and unavoidable impacts in Earth/Geomorphology and Aquatics.

The proponent would have to acquire the necessary lands from Weyerhaeuser for the project to proceed; however, the proponent does not intend to manage these lands as commercial forest, nor is there a long-term land management plan demonstrating how the lost forest capacity, operational constraints, or economic impacts would be addressed. This reinforces our concern that the project carries significant, permanent costs to our working forest landscape without offering commensurate benefit to the Basin's long-term flood challenges.

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We appreciate Ecology's effort to refine the analysis and note that these enhancements would contribute to a more comprehensive understanding of the project's effects and potential mitigation pathways.

Weyerhaeuser has also cooperated by granting access to our private lands for geotechnical, environmental, and engineering surveys requested by project proponents. We consider this cooperation an important contribution to ensuring the analysis is well-informed, while noting respectfully that such cooperation does not constitute support or endorsement of the proposed project.

These points reaffirm and expand upon our longstanding SEPA and NEPA comments regarding disproportionate impacts to commercial forestlands, regeneration challenges, slope and road system stability, and long-term productivity considerations. We believe these topics warrant continued attention in the Final EIS.

Thank you for the opportunity to comment and we remain committed to working constructively with Ecology, Tribes, local governments, and community partners as the environmental review proceeds.

Sincerely,

A handwritten signature in blue ink, appearing to read "Adrian Miller", with a long horizontal flourish extending to the right.

Adrian Miller
Senior Environmental Affairs Director
Weyerhaeuser Company